

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IGNITE USA, LLC,

Plaintiff,

v.

PACIFIC MARKET INTERNATIONAL,  
LLC,

Defendant.

CIVIL ACTION NO. 1:16-CV-01930

Honorable Sara L. Ellis

---

**STIPULATION OF DISMISSAL WITHOUT PREJUDICE**

The above-named Parties have settled this matter pursuant to a Settlement Agreement, the terms of which provide for the substance of this Stipulation of Dismissal Without Prejudice and, to the extent necessary, are incorporated herein by reference.

Pursuant to said Settlement Agreement and in accordance with Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff Ignite USA, LLC and Defendant Pacific Market International, LLC hereby stipulate to a dismissal, without prejudice, of all claims and counterclaims in this action. Each Party shall bear its own costs.

DATED: July 25, 2018

Respectfully submitted,

/s/ Warren J. Thomas

Stephen M. Schaezel (pro hac vice)

GA Bar No. 628653

Warren J. Thomas (pro hac vice)

GA Bar No. 164714

MEUNIER CARLIN & CURFMAN LLC

999 Peachtree Street NE, Suite 1300

Atlanta, Georgia 30309

Phone: 404-645-7700

Fax: 404-645-7707

sschaetzel@mcciplaw.com

wthomas@mcciplaw.com

Jonathan M. Cyrluk (ARDC No. 6210250)

Joshua S. Goldberg (ARDC No. 6277541)

Steven C. Moeller (ARDC No. 6290263)

/s/ Patrick T. Muffo (with permission)

Michael R. Levinson

Patrick T. Muffo

Seyfarth Shaw LLP

131 South Dearborn Street

Suite 2400

Chicago, IL 60603

(312) 460-5000

Fax: (312) 460-7000

mlevinson@seyfarth.com

pmuffo@seyfarth.com

*Counsel for Defendant Pacific Market  
International*

CARPENTER LIPPS & LELAND LLP  
180 North LaSalle Street, Suite 2640  
Chicago, Illinois 60601  
Phone: 312-777-4300 – telephone  
Fax: 312-777-4839 – facsimile  
cyrluk@carpenterlipps.com  
goldberg@carpenterlipps.com  
moeller@carpenterlipps.com

*Counsel for Plaintiff, Ignite USA, LLC*

### **CERTIFICATE OF SERVICE**

I hereby certify that, on July 25, 2018, I electronically filed the foregoing **Stipulation of Dismissal Without Prejudice** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

By: /s/ Warren J. Thomas  
One of the Attorneys for Plaintiff Ignite USA, LLC